

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 Nevada Bar Number 14853
4 JIM W. FANG
5 Assistant United States Attorney
501 Las Vegas Blvd. South, Ste. 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: jim.fang@usdoj.gov
Attorneys for the United States of America

6
7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 KENNETH EDWARD GREENLAND,

12 Defendant.

CASE NO: 2:21-cr-160-APG-VCF

STIPULATION TO CONTINUE
EVIDENTIARY HEARING (FIRST
REQUEST)

14 It is hereby stipulated and agreed, by and between Christopher Chiou, Acting United
15 States Attorney, through Jim W. Fang, Assistant United States Attorney, and Ronald
16 Daniel Hedding, Esq., counsel for defendant, that the evidentiary hearing in the above-
17 captioned matter, previously scheduled for January 25, 2022, at 10:00 a.m., be vacated and
18 continued until a time convenient to the Court, but no earlier than 90 days from the current
19 setting.

20 This Stipulation is entered into for the following reasons:

21 1. The evidentiary hearing for defendant's Motion to Suppress Evidence, ECF
22 No. 63, is currently set for January 25, 2022.

23 2. The parties desire to continue said hearing for 90 days in anticipation of the
24 indictment of a second defendant who will join the motion. The second defendant, Brittany

1 Griesel, was initially charged in the same criminal complaint as Greenland, *see* ECF No. 1,
2 but was assigned to a different case when she pled guilty pre-indictment. However, she has
3 since filed an unopposed motion to withdraw guilty plea, and the government anticipates
4 that Griesel will be charged in the instant matter via a superseding indictment once her
5 motion to withdraw is granted.

6 3. The parties agree that defendants should be allowed to jointly present a
7 common issue to the Court, which would also result in judicial efficiency by allowing the
8 Court to adjudicate this issue only once. The requested continuance would allow (1) Grisel
9 to successfully withdraw her guilty plea; (2) the government to charge Griesel in the instant
10 matter via a superseding indictment; and (3) Griesel to join the pending motion to suppress
11 once she is indicted.

12 4. The parties are concurrently filing a separate stipulation to continue the trial
13 date to accommodate for this request.

14 5. Defendant is out of custody and does not object to this continuance.

15 6. This is the first request for a continuance of the evidentiary hearing.

16 Dated this 18th day of January, 2022.

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

19 By: s/ Jim W. Fang
JIM W. FANG
20 Assistant United States Attorney
Counsel for United States

By: s/ Ronald Daniel Hedding
RONALD DANIEL HEDDING, ESQ.
Counsel for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO: 2:21-cr-160-APG-VCF

VS.

KENNETH EDWARD GREENLAND,

Defendant.

ORDER

Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, IT IS HEREBY ORDERED that the evidentiary hearing currently set for January 25, 2022, *see* ECF No. 77, shall be continued and set for April 29, 2022, 2022, at 10:00 AM.

DATED this 18th day of January, 2022.

HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE